

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
WESTERN DIVISION

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SIMON ZAIDMAN,

Petitioner,

vs.

MOLLY PENTON-ZAIDMAN,

Respondent.

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5:24-CV-05077-RAL

[PROPOSED] STIPULATED  
PRELIMINARY INJUNCTION ORDER

Before the Court is the Verified Petition for Return of the Children to Mexico (the “Petition”) filed by the Petitioner, Simon Zaidman (the “Petitioner”), against the Respondent, Molly Penton-Zaidman (the “Respondent”) pursuant to The Hague Convention on the Civil Aspects of International Child Abduction and the International Child Abduction Remedies Act (“ICARA”) [ECF No. 1]. Upon the consent of both parties, as evidenced by the signatures of their respective counsel below, it is hereby:

1. **ORDERED**, that both Petitioner and Respondent are prohibited from removing C.Z. and M.Z. (collectively the “Children”) or causing the Children to be removed from the jurisdiction of this Court, pending final disposition of the above-referenced Petition; and it is further
2. **ORDERED**, that Petitioner shall surrender the Children’s Austrian passports to the Court upon arrival in the United States; these passports shall be returned to Petitioner at the conclusion of the Hague proceeding. The Children’s U.S. passports

shall likewise be returned to Respondent at the conclusion of the Hague proceeding;  
and it is further

3. **ORDERED**, that the two-day evidentiary hearing currently set for November 6, 2024, shall now be extended to a three-day evidentiary hearing to be held on February 3, 2025, February 4, 2025, and February 5, 2025; and it is further
4. **ORDERED**, that the parties, through their counsel of record, shall continue to confer regarding the scheduling of initial disclosures and a proposed discovery plan, as required by Federal Rule of Civil Procedure 26(f).

DATED at \_\_: \_\_ this \_\_ day of \_\_\_\_\_, 2024.

BY THE COURT:

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ROBERTO A. LANGE  
CHIEF JUDGE

**SEEN AND APPROVED AS TO FORM AND CONTENT:**

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